

From: [Houlihan, Damien](#)
To: [Tillotson, Elizabeth](#)
Cc: [Gaito, Danielle](#); [Stein, Mark](#); [Andrews, James](#); [Curley, Michael](#)
Subject: RE: GSP responses to EPA comments on Schiller Wedgewire Screen Pilot Study Report
Date: Thursday, December 10, 2020 12:51:36 PM

Hi Lynne –

This email is a follow-up to the voicemail message I left for you last Wednesday, December 2, 2020.

I had called you to discuss GSP's November 20, 2020 letter and enclosures. These documents were submitted in response to EPA's comments and questions (September 28, 2020) on GSP Schiller's wedgewire screen reports, dated July 30, 2020 and also in anticipation of not submitting a final wedgewire screen design this month per the permit.

In short, the Region disagrees with GSP's reading of 40 CFR Section 122.47(b)(1)(ii). The Region does not believe that placing Schiller's generating units in a "planned outage until May 31, 2021" meets the requirement in the regulation to "cease conducting permitted activities" or makes the December 30, 2020, milestone in the permit "no longer applicable."

While the facility is in a temporary outage and is not withdrawing cooling water through its intake structures at this time, it does not appear that GSP presently intends to permanently cease (i.e., "terminate") operations. Instead it appears that GSP intends for Schiller to resume some level of operations. Nor has GSP proposed any two-track schedule, such as may be considered under 40 CFR 122.47(b)(3). Region 1 would like to discuss with GSP how best to proceed taking into account all of these considerations.

Please let me know when would be a good time for you and your team to discuss further. Thanks

Damien

*Damien Houlihan, Chief
Industrial Permits Section
US EPA*

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From: Tillotson, Elizabeth <Elizabeth.Tillotson@graniteshorepower.com>
Sent: Friday, November 20, 2020 2:54 PM
To: Houlihan, Damien <houlihan.damien@epa.gov>
Cc: Gaito, Danielle <Gaito.Danielle@epa.gov>; Stein, Mark <Stein.Mark@epa.gov>; Andrews, James <James.Andrews@graniteshorepower.com>
Subject: GSP responses to EPA comments on Schiller Wedgewire Screen Pilot Study Report

Hello Damien -

Attached please find a letter and enclosures which provide GSP Schiller LLC's response to your letter

dated September 28, 2020, which included comments and questions on the wedgewire screen reports submitted by GSP Schiller to EPA on July 30, 2020.

I do appreciate your time and cooperation in this matter. If you have questions, please do not hesitate to call me at 603-230-7968 or email me at elizabeth.tillotson@graniteshorepower.com. Thank you.

Lynn Tillotson

Executive Director Administration and Regulatory Affairs

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